



## Modern Slavery and Human Trafficking Statement

### Our Organization

OpenText™ is a leading Cloud and AI company that provides organizations around the world with a comprehensive suite of Business AI, Business Clouds, and Business Technology. We help organizations grow, innovate, become more efficient and effective, and do so in a trusted and secure way – through Information Management.

At OpenText, we are AI-first—embedding artificial intelligence across our solutions to help organizations unlock the full potential of their information.

OpenText is a publicly traded company listed on the NASDAQ (OTEX) and the Toronto Stock Exchange (OTEX). With its headquarters in Waterloo, Canada, the OpenText group employs over 20,000 employees worldwide.

For more information on who we are and what we do, we welcome you to visit [www.opentext.com](http://www.opentext.com).

This statement is made on behalf of Micro Focus AS pursuant to the Norwegian Transparency Act 2022 (the “Act”) for the calendar year ended 31 December 2024 (the Reporting Year). It also covers our foreign branches in Finland, Sweden, and Denmark. Other OpenText group entities have made similar statements in the United Kingdom and Australia.

### Our Supply Chain

OpenText is committed to fighting against forced labour and child labour. As a software company, OpenText neither operates in an industry, nor has an extensive range of local or international suppliers, where in each case modern slavery or human trafficking would be a material risk. We are fully committed to ensuring the prevention of slavery and human trafficking in our corporate activities by promoting transparency in our organization and throughout our supply chain. Our supply chain predominantly consists of:

- Suppliers of products and services used, incorporated into, or sold alongside our own product and services offerings (including facilities providers, software development, support service providers, cloud service providers, IT service providers, ICT hardware and the like)
- Suppliers of products and services for marketing merchandise, stationery, cleaning, catering, maintenance services, travel providers, hospitality services, security, and human resource services, including recruitment agencies
- Professional services of various advisors, including external law firms, tax advisors, accountants, and insurance brokers

We have a central Procurement team that manages the procurement of goods and services in accordance with our organization’s procurement policies and formal tendering procedures. We are dedicated to conducting our business ethically and in compliance with all applicable laws. Through their dealings with our Procurement team, we require our suppliers to maintain the same standard of excellence.

### Our Policies and Commitments

We take very seriously our responsibilities to:

- Act ethically and with integrity in every situation, and to support an ethical supply chain
- Embrace fairness, dignity, and respect in our workplace, and to empower our employees
- Work with local organizations to support the communities in which we operate
- Mitigate our environmental impact and help our customers do the same

### *Inclusion*

OpenText is committed to an ethical and responsible work environment that goes beyond compliance with legislation. OpenText believes that fairness, dignity and respect are fundamental to achieving OpenText's strategic goals and play a critical role in driving our competitiveness, bringing more creativity, better decision-making, and enhanced innovation. We elevate potential and performance, ensuring fair access to opportunities regardless of background. We invest in helping each other get to be their best and welcome each individual's differences and unique qualities.

### **Compensation and Benefits**

We are confident we offer our employees a competitive compensation package and attractive group benefit plans, which are designed to protect employees and their dependents against financial hardship due to illness or injury.

Our time-off policies recognize that employees can only bring their best selves to work when they are well rested and focussed. We remind our employees to take their vacation time, to recharge and re-energize, and we ensure our time-off policies provide flexible time off for religious observation and volunteer activities.

### **Recruitment**

Our recruitment procedures include a robust background check policy and recruitment process to ensure that people working for us are of legal age and have legal status. In addition, background checks are performed in order to verify education, employment history and residential status, where applicable.

Trust is one of our core values, and to maintain our company's position as a market leader, it is crucial for us to earn the trust of our customers, our employees, our investors, and the communities in which we operate. We are committed to complying with all applicable laws and regulations. Employees are not only expected to obey all applicable laws and regulations, but also to conduct themselves with integrity and respect. Our [Code of Business Conduct and Ethics](#) explains how we can do our part in achieving these important objectives and take action against human trafficking, child labour and forced labour in our business and supply chain. All employees, officers, directors, vendors, contractors and partners are required to conduct themselves in a manner consistent with our Code of Business Conduct and Ethics.

Our annual Code of Business Conduct and Ethics training covers human rights issues, is proactively communicated to employees, and included in annual compliance training. Additional training is provided in specific regions and/or countries where legally required.

It is important to us to maintain a workplace in which the company can receive and address concerns regarding any matter governed by the Code of Business Conduct and Ethics. Employees, officers and directors are encouraged to raise such concerns on a confidential basis, free from discrimination, retaliation or harassment, anonymously or otherwise, to our Compliance Officer.

As part of the OpenText Board governance process, we review the Code of Business Conduct and Ethics annually to ensure that it remains robust, addresses evolving risk and circumstances and stays up to date with applicable legislation worldwide, including the Act.

Additional OpenText policies and procedures which are relevant for mitigating the risk of slavery or human trafficking (including forced labour and child labour) occurring in our business or in our supply chain include the following:

- Accommodation Policy
- Anti-Bribery and Anti-Corruption Policy
- Anti-Harassment and Anti-Discrimination Policy
- Background Check Policy
- Disciplinary Policy
- Inclusion Policy
- Grievance Procedure
- Health & Safety Corporate Statement
- Human Rights Policy
- Occupational Health and Safety Statement
- Privacy Policy for Employees
- Respect in the Workplace Policy
- Supplier Code of Conduct

- Whistleblower Policy
- Workplace Violence Prevention Policy

### **Corporate Citizenship**

Our business operations are conducted in ways that respect human rights, support our workforce, and interact with our clients and suppliers with integrity. We are committed to our role as a responsible corporate citizen and to delivering the greatest value and impact while complying with all regulatory requirements. Our global impact goals and initiatives are guided by the OpenText Way – we lean into the strength and foundation of our core values to move us forward. We know that Great People make Great Software. Great people write great software through design that is oriented on their **Values**: (1) Puts customers first (2) Tackles challenges head on (3) Innovates (4) Helps teams succeed (5) Cares about people (6) Acts ethically. Our HR programs and how we operate are informed by these values.

Our [Corporate Citizenship Report](#) reflects our commitment to transparency and our commitments to our stakeholders and society. Our corporate citizenship governance framework sets out a structured approach to pursuing and managing activities across the company.

### **Risk Assessment and Due Diligence**

Our Suppliers are expected to conduct their businesses responsibly and ethically and comply with applicable laws and regulations. Our [Supplier Code of Conduct](#), [Human Rights Policy](#), [Sustainable and Ethical Procurement Policy](#), and [Environmental Policy](#) underpin our commercial relationships and outlines the standards that we require our suppliers to meet (including in relation to forced labour and child labour). Our expectations apply to supplier environmental responsibility, upholding human rights, integrity, and fair and honest dealings. To the extent reasonably possible, we will not knowingly engage with suppliers (including their supply chain) that are likely to cause adverse social and environmental impacts. We prioritize suppliers who demonstrate that they have embedded sustainability within their products, their operations and their supply chains. For more information pertaining to doing business with OpenText, please visit our [OpenText Supplier Information Page](#).

Our Request for Proposal (RFP) template includes risk analysis questions to prospective suppliers seeking to elicit information on a supplier's business model and how its supply chain is engaged. Our RFP also includes sustainability criteria, including whether suppliers report on their social and environmental performance, have public commitments and goals, and whether they have third party sustainability certifications corporate-wide or specific to the products/services they supply to OpenText.

Our supplier agreements make clear that suppliers must provide goods and services in accordance with our Supplier Code of Conduct, and that all OpenText policies and procedures must be adhered to. Where our agreement is not utilised, we include our own language requiring the supplier to adhere to our Supplier Code of Conduct. Our [Purchase Order Terms and Conditions](#), together with our supplier agreements, include a termination clause for non-compliance of our Supplier Code of Conduct as a material breach.

In the Reporting Year, we completed modern slavery awareness training for our Procurement team. A statutory declaration was developed for signature by suppliers identified as medium or high-risk by geography and type of service, declaring that they will provide services in line with the Act and applicable legislation worldwide.

We continue to monitor and review our suppliers on an ongoing basis using a trusted supplier risk monitoring solution. New suppliers are subject to an appropriate level of risk assessment and screening. We monitor against various government sanctions, violations (including labor, health & safety, ethical/regulatory, data protection and environmental matters) and financial/credit risks. As part of our review, we also receive corporate social responsibility ratings for our top tier suppliers. This active monitoring provides us with a means to further ensure that suppliers are compliant with relevant legislation and key elements of our Supplier Code of Conduct. Suppliers identified as having a higher risk are requested to provide additional information to ensure they have social and environmental policies and practices in place to mitigate.

We have joined various industry initiatives to help accelerate progress and impact. Many of our customers use EcoVadis, a trusted third-party provider of business corporate social responsibility ratings, to assess their suppliers. OpenText had a Silver rating in the Reporting Year.

Our Enterprise Risk Management program drives the identification, analysis and management of risk across OpenText. The board of OpenText has overall responsibility for risk oversight. The board is responsible for overseeing management's implementation and operation of enterprise risk management, either directly or through its committees, which report to the board with respect to risk oversight undertaken in accordance with their respective charters.

At least annually, the board reviews with management the risks inherent in the business of the company (including appropriate crisis preparedness, business continuity, information systems controls, cybersecurity, disaster recovery plans and corporate citizenship matters), the appropriate degree of risk mitigation and risk control, overall compliance with and the effectiveness of the company's risk management policies, and residual risks after implementation of controls.

The Transparency Act requires the company to perform due diligence in accordance with the OECD guidelines for multinational enterprises. This approach to due diligence recognizes the need to have processes in place to identify, prevent, mitigate, and account for how the impact on human rights is addressed. It is understood that this is an ongoing activity, as risks may change over time in line with operational changes or external influences.

## **Staff Training**

As a publicly traded, global company, employees are required to complete a number of mandatory compliance training courses on an annual basis as a result of industry, regional or corporate requirements, and to familiarise themselves with our corporate policies and procedures. In particular, all employees must complete annual Code of Business Conduct and Ethics training and sign off that they understand and are compliant with these organizational expectations.

## **Goals for the next Reporting Year**

We will continue to monitor against various government sanctions, violations (including labor, health and safety, ethical/regulatory, data protection and environmental matters) and financial/credit risks utilizing our supplier risk monitoring solution, monitoring the percentage of suppliers that fall into medium or high-risk categories.

The statutory declaration developed and completed in the Reporting Year will be sent out to our suppliers identified as medium or high-risk by geography and type of service for signature.

We will continue to deliver mandatory modern slavery awareness training to our Procurement team working with our suppliers. Mandatory training will be rolled out to the business units utilizing medium or high-risk services. We will continue to monitor the number of staff that access this training.

Whilst OpenText neither operates in an industry, nor has an extensive range of local or international suppliers, where in each case modern slavery or human trafficking (including forced labour or child labour) would be a material risk, we will continue to review and monitor our systems and controls in order to identify any potential risk areas and remain committed to improving our practices and procedures to combat slavery and human trafficking.

Slavery and human trafficking (including forced labour and child labour) do not exist in our organization or, to the best of our knowledge, our supply chain.

**Christian Waida**

**Chairman and Director of Micro Focus AS**



30 June 2025

**I have the authority to bind Micro Focus AS**